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CLERK OF DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
FILED

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff,
v.
JEFFREY CRAIG YOHAI,
Defendant.

CR No. **CR18-00834**
I N F O R M A T I O N
[18 U.S.C. §§ 1349, 3147:
Conspiracy to Commit Wire
Fraud, Committed on Release; 18
U.S.C. §§ 1028A, 3147:
Aggravated Identity Theft,
Committed on Release]

The United States Attorney charges:

COUNT ONE

[18 U.S.C. §§ 1349, 3147]

Beginning in August, 2017, and continuing through at least October 30, 2018, in Los Angeles County, within the Central District of California, and elsewhere, defendant JEFFREY CRAIG YOHAI ("YOHAI"), together with others known and unknown, conspired to commit wire fraud, in violation of Title 18, United States Code, Section 1343. The object of the conspiracy was carried out, and to be carried out, in substance, as follows:

Defendant YOHAI and his co-conspirators would attempt to trick lenders into providing refinancing loans based on false and inflated property appraisals.

1 Defendant YOHAI would also gain access to luxury homes
2 owned by others by pretending to be interested in buying or
3 leasing the property, or by viewing the property and then
4 leaving a back door open through which defendant YOHAI could
5 later enter. Defendant YOHAI would then falsely claim to victim
6 short-term renters that he owned or controlled the properties in
7 order to solicit from them rent payments--which defendant YOHAI
8 would keep for himself and not provide to the victim true owners
9 of the properties--as well as security deposits--which defendant
10 YOHAI would not refund after the renters left.

11 Defendant YOHAI and his conspirators would also take from
12 victim purchasers payment for exclusive passes to a music
13 festival which defendant YOHAI and his conspirators did not
14 possess and did not provide.

15 When the victims demanded payment, defendant YOHAI and his
16 co-conspirators would lull them with false promises of refunds,
17 worthless checks, and falsified records of wire transfers as
18 purported proof of payment. Defendant YOHAI and his co-
19 conspirators intended to execute, and did execute, this
20 fraudulent scheme through the use of interstate wires.

21 Defendant YOHAI committed this felony while on release
22 under Title 18, United States Code, Chapter 207, in another
23 case.

COUNT TWO

[18 U.S.C. §§ 1028A, 3147]

Beginning in February, 2017, and continuing through at least October 30, 2018, in Los Angeles County, within the Central District of California, and elsewhere, defendant JEFFREY YOHAI knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, during and in relation to a felony violation of Title 18, United States Code, Section 1349, Conspiracy to Commit Wire Fraud, as charged in Count One.

Defendant YOHAI committed this felony while on release under Title 18, United States Code, Chapter 207, in another case.

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